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December 18, 2023

VIA CM/ECF

The Honorable Leda D. Wettre, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Shaporov, Alexander v. SONJ, et al.
Civil Action No. 22-01150 (EP/LDW)

Dear Judge Wettre:

The undersigned represents Defendants State of New Jersey, Palisades Interstate Parkway Commission, Palisades Interstate Parkway Police Department ("PIPPD"), and PIPPD P.O. Matthew Levine Badge No. 366, PIPPD Sgt. Gregory D. Kimbro, Jr. Badge No. 368; PIPPD P.O. Timothy Conboy Badge No. 393; PIPPD P.O. Peter Wojcik Badge No. 406; and PIPPD P.O. Scott Bilotti, Badge No. 413 (collectively, "State Defendants") in the above-captioned matter. State Defendants and Plaintiff jointly submit the attached consent order for execution and entry.

As outlined in the previous letter to the Court, dated December 14, 2023, certain documents relevant to this civil litigation are sealed and/or expunged. The parties submit a consent order for execution to facilitate retrieval of the sealed and/or expunged documents relevant to this civil litigation.

Based upon the foregoing, the parties respectfully request that the Court execute the consent order attached hereto as Exhibit A.



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The parties thank Your Honor for your time and attention to this matter. We will await a Text Order on how the Court wishes to proceed.

Respectfully submitted,

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Thomas Sindel
Thomas Sindel
Deputy Attorney General
NJ Attorney ID: 340392021

cc: All counsel of record

Exhibit A

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY
R.J. Hughes Justice Complex
25 Market Street
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Trenton, New Jersey 08625
Attorney for Defendants,
State of New Jersey, Palisades Interstate Parkway Commission,
Palisades Interstate Parkway Police Department, PIPPD P.O.
Matthew Levine, Badge No. 366; PIPPD Sergeant Gregory D.
Kimbrow Jr, Badge No. 368; PIPPD P.O Timothy Conboy,
Badge No.3931 PIPPD P.O Peter Wojcik, Badge No. 406;
and PIPPD P.P. Scott Bilotti, Badge No. 413.

By: Thomas Sindel (340392021)
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
NEWARK VICINAGE**

<p>ALEXANDER SHAPOROV,</p> <p>Plaintiff,</p> <p>v.</p> <p>STATE OF NEW JERSEY, <i>et al.</i>,</p> <p>Defendants.</p>	<p>Hon. Evelyn Padin, U.S.D.J. Hon. Leda D. Wettre, U.S.M.J.</p> <p>Civil Action No. 2:22-CV-01150-EP-LDW</p> <p>CONSENT ORDER PERMITTING RELEASE AND USE OF INFORMATION CONTAINED IN SEALED AND EXPUNGED RECORDS PURSUANT TO N.J.S.A. 2C:52-19</p>
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THIS MATTER having come before the Court on application by the parties,
Plaintiff Alexander Shaporov represented by William Igbokwe, Esq. and Matthew J.

Platkin, Acting Attorney General of New Jersey, Thomas Sindel, Deputy Attorney General, appearing on behalf of Defendants State Of New Jersey, Palisades Interstate Parkway Commission, Palisades Interstate Parkway Police Department, PIPPD P.O. Matthew Levine, Badge No. 366; PIPPD Sergeant Gregory D. Kimbro Jr, Badge No. 368; PIPPD P.O Timothy Conboy, Badge No.393l PIPPD P.O Peter Wojcik, Badge No. 406; PIPPD P.P. Scott Bilotti, Badge No. 413 (collectively, “State Defendants”), for the entry of an Order permitting release and use of information in sealed and expunged records pursuant to N.J.S.A. 2C:52-19, and for good cause shown:

IT IS ON THIS _____ DAY OF _____, 2023:

1. ORDERED and ADJUDGED that the information contained in sealed and expunged records relating to Complaint No. 0288-S-2020-000056, Ticket No. 0288-E20-003339, and Ticket No. 0288-E20-003340 pursuant to N.J.S.A. 2C:52-19 be released for use in the litigation concerning Civil Action No. 2:22-CV-01150-EP-LDW;

2. IT IS FURTHER ORDERED AND ADJUDGED that the information and records sealed and expunged may be inspected, disclosed along with the information contained therein, by and between the parties in conjunction with any and all discovery devices authorized in the civil action now pending and being litigated by the parties;

3. IT IS FURTHER ORDERED and ADJUDGED that the named parties as well as their counsel, along with any and all experts employed thereby, shall likewise be permitted inspection of the files and records or release of the information contained

therein and which were the subject of the Expungement Order, including filing of charges, return of indictment, testimony and transcripts of defendants before the grand jury, as well as any and all other information related to and discovered in the course of the underlying criminal action, Complaint No. 0288-S-2020-000056, and underlying traffic infractions, Ticket No. 0288-E20-003339 and Ticket No. 0288-E20-003340.

IT IS SO ORDERED.

Dated: _____

HON. LEDA DUNN WETTRE, U.S.M.J.

**IGBOKWE, PLLC d/b/a LAW
OFFICE OF WILLIAM
IGBOKWE**



William Igbokwe, Esq.
Attorney for Plaintiff

**MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW
JERSEY**



BY: Thomas Sindel, DAG
Attorney for State Defendants

THE MAGLIONE FIRM, PC



Dean Maglione, Esq.
Attorney for Plaintiff